

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

August 6, 2013

*Re: In the Matter of Accessibility of User Interfaces, and Video Programming
Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking
(FCC 13-77)*

Dear Commissioners:

Danvers Community Access Television, Inc. (DCAT) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Danvers Community Access Television is non-profit, 501©(3), membership-based corporation established in 2001 to manage facilities for community access programming on the Public, Educational and Governmental (PEG) Access channels of the Town of Danvers, Massachusetts, cable television system. Our programming is available to 10,000 subscribers Danvers community.

We carry fifty weekly, first-run programs on our channel(s) of which zero are closed captioned.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast and Verizon both describe the onscreen program guide as Local Programming. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA).

Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

Dana Healy
Executive Director
Danvers Community Access Television